

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION


U.S. Magistrate Judge

IN RE COMMUNITY HEALTH SYSTEMS INC.
SHAREHOLDER DERIVATIVE LITIGATION

This Document Relates To: All Actions

Master Docket No. 3:11-cv-00489

(Consolidated with No. 3:11-cv-00598 and
No. 3:11-cv-00952)

Judge John T. Nixon

Magistrate Judge E. Clifton Knowles

**DEFENDANTS' MOTION FOR LEAVE TO FILE A REPLY IN FURTHER
SUPPORT OF MOTION TO STAY DISCOVERY**

Pursuant to Local Rule 7.01(b), Defendants T. Mark Buford, W. Larry Cash, John A. Clerico, James S. Ely, III, John A. Fry, William Norris Jennings, Julia B. North, T. Wayne Smith, H. Mitchell Watson, Jr., and Community Health Systems, Inc. ("CHSI") (collectively, "Defendants") respectfully request leave of Court to file a Reply in further support of their Motion to Stay Discovery (Doc. No. 91).

In their response to Defendants' Motion to Stay Discovery, Plaintiffs raise new facts, both in their Opposition and in a Declaration filed with their Opposition, as the basis for denying Defendants' Motion. (Doc. Nos. 92, 93.) Additionally, Plaintiffs dispute the standard for granting a discovery stay under Sixth Circuit law. Defendants' proposed Reply, attached as Exhibit 1, addresses these important issues.

Accordingly, Defendants respectfully request that the Court grant the Motion and direct the clerk to enter the attached Reply on the docket.